

July 18, 2003

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Mary L. Cottrell  
Secretary  
Department of Telecommunications & Energy  
Commonwealth of Massachusetts  
One South Station, 2d Floor  
Boston, Massachusetts 02110

**Re: D.P.U./D.T.E. 97-88/97-18 (Phase II)**

Dear Ms. Cottrell:

On February 21, 2003, the Hearing Officer in the referenced Docket requested comments on “proposed PAL and PASL rates based on the February 13, 2003, D.T.E. 01-20 TELRIC filing”, which proposed rates were to be filed by Verizon Massachusetts, Inc. (“Verizon”) by March 3, 2003. Verizon filed the proposed rates on March 3 and then filed a revision thereto on April 15, 2003.

As of April 15, 2003, however, Verizon’s “February 13, 2003, D.T.E. 01-20 TELRIC filing”, on which the proposed PAL and PASL rates were based, had not yet been approved by the Department (i.e., was subject to revision). The New England Public Communications Council noted this fact in its Initial Comments, filed on April 24, 2003 herein. See NEPCC Initial Comments, at pp. 7-8. Verizon acknowledged this status in its Reply Comments, filed on May 19, 2003. See Verizon Reply Comments, at p.4.

Since that filing, the Department, in Docket 01-20, has in fact required adjustment of Verizon’s February 13, 2003, TELRIC filing. As a result, Verizon has now filed two revisions to that filing. The first was filed June 12, 2003; the second was filed July 2, 2003. In each case, the revisions affected TELRIC rates for UNEs which are components of the “proposed PAL and PASL rates” finally submitted by Verizon on April 15, 2003. For example, in its April 15, 2003 proposal, Verizon employed a rate of \$2.73 for a PAL Port and \$2.63 for a Coin Telephone Port. Yet, in its June 12, 2003 revision filed in Docket 01-20, Verizon now tariffs a PAL Port at \$2.22 and a Coin Telephone Port at \$2.48. Nevertheless, Verizon has not filed any revisions to its April 15, 2003 PAL/PASL proposal, despite the fact that it is now based on inapplicable UNE rates.

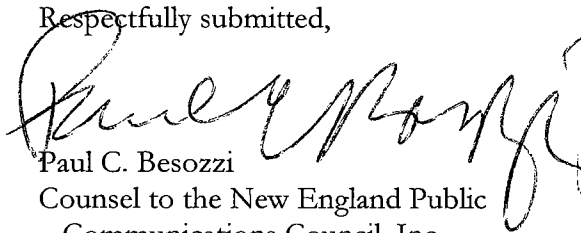
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The purpose of this letter is to request, as permitted under Section 1.10(3) of the Department's rules, that these Verizon filings in Docket 01-20, which have a direct bearing on Verizon's April 15, 2003 proposed PAL and PASL rates, be incorporated by reference in the record in this Docket for consideration by the Department in resolving the remaining issues herein.

Respectfully submitted,



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